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ATTORNEYS AT LAW

PLUERAL ELECTION COMMISSION MAIL ROOM A REGISTERED LIMITED LIABILITY PARTNERSHIP

INCLUDING PROFESSIONAL CORPORATIONS

1333 NEW HAMPSHIRE AVENUE, N.W.

Mar 4 3 32 PH 199 SUITE 400

WASHINGTON, D.C. 20036 (202) 887-4000 FAX (202) 887-4288 www.akingump.com

WRITER'S DIRECT DIAL NUMBER (202) 887- 4589

March 4, 1999

Mr. F. Andrew Turley, Supervisory Attorney Federal Election Commission Central Enforcement Docket 999 E Street, N.W. Washington, D.C. 20463

Re: MUR 4880

Dear Mr. Turley:

The February 6, 1999 response submitted to the Federal Election Commission ("FEC" or "Commission") by Mr. R.M. "Cook" Barela in connection with MUR 4816 fails to identify or describe any activity or conduct by the Arab American Institute ("AAI") or Dr. James Zogby that violates the federal election laws. Rather, Mr. Barela's response to a complaint filed against him by an opponent in the 1998 congressional primary election consists of wild, unsubstantiated claims of an international conspiracy. The closest Mr. Barela comes to even hinting at a violation of Federal election law is a reference he makes to an article appearing in an obscure publication in 1997 that, based on an unidentified source, accuses AAI and Dr. Zogby generally of using AAI funds to pay Arab Americans for making campaign contributions. This allegation is false and unsubstantiated.

Mr. Barela's response is a rambling diatribe of offensive innuendo and insults against Arab Americans. It is offensive not only to Arab Americans but to all Americans, because it attempts to assign insidious motivations and characterizations to a segment of our society based solely on their ethnicity. Mr. Barela's attempt to recast his response into a complaint against AAI, Dr. Zogby, and others he deludes himself into believing are parties to an international conspiracy, departs so far from making a valid claim that it is frivolous and an abuse of the administrative process.

cc: Alva E. Smith

STATEMENT OF DESIGNATION OF COUNSEL

MUR4880
NAME OF COUNSEL: George R. Salem & William J. Farah
FIRM: Akin, Gump, Strauss, Hauer & Feld, L.L.P.
ADDRESS: 1333 New Hampshire Avenue, N.W., Suite 400
Washington, D.C. 20036
TELEPHONE:(202) 887-4589
FAX:(_202_)887-4288
The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.
February 18, 1999 Signature
Helen Samhan, Executive Vice President
RESPONDENT'S NAME: Arab American Institute, Dr. James Zogby, President
ADDRESS: 918 16th Street, N.W., #601
Washington, D.C. 20006-2902
TELEPHONE: HOME()
BIISINESS/ 202 \ 420 0240